



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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January 22, 2008

Ref: 8EPR-N

Ms. Janet Valle  
Acting Logan District Ranger  
1500 East Highway 89  
Logan, Utah 84321

RE: Millville Peak/Logan Peak Road  
Reconstruction Project Final Environmental  
Impact Statement (FEIS) CEQ# 20070528

Dear Ms. Valle:

Under Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the Environmental Protection Agency (EPA) has the responsibility to review and comment on the environmental impact of major federal actions to which the National Environmental Policy Act (NEPA) applies. Consistent with these responsibilities, EPA has reviewed the United States Forest Service's (USFS) Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) on the proposed relocation of 5.4 miles of the Millville Peak and Logan Peak Roads into or adjacent to roadless areas via a waiver for road reconstruction under the 2001 Roadless Rule. After considering all public comments on its proposal, the USFS has decided to proceed with this project as described under Alternative A.1.

The EPA appreciates receipt of specific responses to all of the Draft Environmental Impact Statement (DEIS) comments included in our September 5, 2007 letter. We believe the additional information (e.g., photographs) included in the Background Information (Sections 1.2.1 and 1.3) better characterizes the deteriorating conditions of the existing road making travel, road maintenance (including erosion control), and rehabilitation of the high voltage power cable along this road increasingly dangerous and unsafe. We also appreciate the inclusion of specific references to USFS engineers' conclusions in support of these findings. However, in the interest of public disclosure under NEPA, we suggest the USFS consider inclusion of substantive engineering and/or analytical reports containing these conclusions as appendices to DEISs on future, similar projects.

In terms of adequately documenting "irreparable resource damage" as the basis for granting "exceptions" to the 2001 Roadless Rule, the photographs added in Section 1.2.1 and Chapter 3.6 definitively illustrate the severely eroded slopes and gullies in the existing road that have resulted in considerable loss of soil resources. Consequently, it is apparent to us that the resultant sedimentation into Providence Lake and other aquatic resources represent significant

environmental impacts. We also agree that while the rate of soil loss would be less if the road was closed to recreational use only, the long-term environmental impacts could still be significant.

We acknowledge the inclusion of additional mitigation measures under the “Aquatics” (page 2-7) and “Recreation” (page 2-8) sections of Chapter 2.5. We believe these will be important in helping ensure that: 1) the new and returning vegetative cover on the decommissioned roads will ultimately prevent long-term impacts to adjacent aquatic resources; 2) effective placement of barriers (e.g., logs and rocks) where the new and old road alignments intersect will prevent unauthorized recreational use of decommissioned roads; and 3) ripping and re-seeding the existing road surface will ultimately provide cover for areas of the road where the cable is exposed.

In response to our recommendation to establish a long-term monitoring or adaptive management plan, we are pleased that the USFS has included a new monitoring section (2.5.1) to assess the effectiveness of its mitigation measures and ensure compliance with its management requirements. We believe these monitoring activities will help address ongoing and potential environmental impacts associated with the existing road remediation/decommissioning and new road construction into or adjacent to roadless areas. While we remain concerned that the net environmental impact could still be significant, we agree that long-term monitoring for unauthorized recreational use, infestation of noxious weeds, and impacts to scenic integrity, water quality, and wildlife habitat will better enable the USFS to realize its goal of resource improvement through this project.

Thank you for giving serious consideration to our comments on the DEIS. We appreciate the opportunity to review the proposed project and participate during the NEPA process. If you have any questions, please contact Douglas Minter of my staff at (303) 312-6079, or me at (303) 312-6004.

Sincerely,

/s/ Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation

